UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

PERSONALIZED MEDIA COMMUNICATIONS, LLC, Plaintiff, v. NETFLIX, INC., Defendant.	**Civil Action No. 2:19-cv-00091-JRG**

NETFLIX'S UNOPPOSED MOTION FOR LEAVE
TO FILE ITS MOTION TO DISMISS OR, IN THE ALTERNATIVE,
TO TRANSFER FOR IMPROPER VENUE UNDER SEAL

Pursuant to L.R. CV-5(a)(7), Netflix, Inc. ("Netflix") files this Unopposed Motion for Leave to File its Motion to Dismiss or, in the alternative, to Transfer for Improper Venue ("Motion") under seal.

Netflix's Motion and attachments contain confidential information of such a sensitive nature that its disclosure creates a risk of harm that outweighs the strong presumption in favor of public access to judicial proceedings. Netflix has conferred with Plaintiff's counsel, and they do not oppose the sealing of Netflix's Motion. Accordingly, Netflix respectfully requests that the Court allow Netflix to file its Motion and accompanying attachments under seal.

Respectfully submitted,

/s/ Jennifer H. Doan
Jennifer H. Doan
Texas Bar No. 08809050
Kyle R. Akin
Texas Bar No. 24105422
HALTOM & DOAN
6500 Summerhill Road, Suite 100
Texarkana, TX 75503
Telephone: (903) 255-1000
Facsimile: (903) 255-0800
Email: jdoan@haltomdoan.com
Email: kakin@haltomdoan.com

OF COUNSEL:

Clement Roberts
ORRICK HERRINGTON &
SUTCLIFFE LLP
The Orrick Building
405 Howard Street
San Francisco, CA 94105-2669
Phone: 415-773-5700
Email: croberts@orrick.com

Alyssa Caridis
ORRICK HERRINGTON &
SUTCLIFFE LLP
777 South Figueroa Street, Suite 3200
Los Angeles, CA 90017-5855
Phone: 213-629-2020
Email: acaridis@orrick.com

**ATTORNEYS FOR DEFENDANT
NETFLIX, INC.**

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). All other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by electronic mail on this 30th day of May, 2019.

/s/ Jennifer H. Doan
Jennifer H. Doan

NETFLIX'S UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL – **Page 2**